

CAUSE NO. 2018-23733

KHAWAJA PARTNERS, LTD.

Plaintiff,

vs.

JETALL COMPANIES, INC.

Defendant.

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

129TH JUDICIAL DISTRICT

AFFIDAVIT OF SAJID ALI, M.D.

THE STATE OF TEXAS

COUNTY OF HARRIS

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BEING DULY SWORN, Sajid Ali, M.D. deposes and testifies as follows:

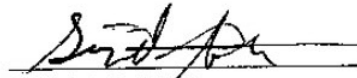
1. My name is Sajid Ali. I am over twenty-one years of age, of sound mind, have never been convicted of a felony or a crime involving moral turpitude, and am competent to make this Affidavit and have personal knowledge of each matter to which I testify herein.
2. I am a board-certified interventional cardiologist practicing in the Houston area. Houston Cardiology Consultants employs me.
3. I gave a deposition in this case on July 10, 2024. I have since learned what is being done with my testimony. To clarify my testimony, I am providing the following statement.
4. In late June 2024, I was served with a subpoena to appear for a deposition and produce medical records of a patient, Ali Choudhri. Before this, I had never been subpoenaed; I had never given a deposition or any sworn testimony in court or otherwise. I was not represented by legal counsel. Not knowing what to do, I contacted and spoke with

AFFIDAVIT OF SAJID ALI, M.D.

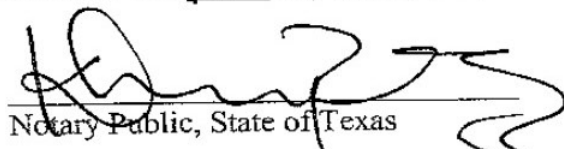
Ashish Mahendru, the lawyer who issued the subpoena. Mahendru told me that I had to comply with the subpoena, and I needed to do the deposition. I appeared for the deposition on the afternoon of July 10, 2024. This was two days after Hurricane Beryl hit Houston. I had no power and, therefore, had to participate in the deposition from my car on my cell phone. I did my best to comply with what I thought was court-ordered under these conditions.

5. I treated Ali Choudhri at Houston Cardiology Consultants on June 7, 2024. He came to me after he suffered a transient stroke. He brought MRI records signed by an MD radiologist from Townsen Memorial Hospital indicating a lesion on the right temporal lobe (focal acute infarct in the right temporal lobe). He had then been admitted to the stroke unit at Methodist Hospital with a primary diagnosis of stroke. The patient mentioned that he was under a great deal of work-related stress. Until he consulted with a neurologist and underwent a further medical workup, I suggested that he avoid strenuous or stressful activities, which is the reasonable and appropriate medical course of action. Mr. Choudhri asked me for a letter for work purposes disclosing my recommendation and I provided him with one, a copy of which is attached.

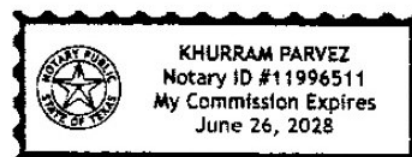
Further affiant sayeth not.


Sajid Ali, M.D.

SUBSCRIBED AND SWORN TO BEFORE ME on this 16th day of September 2024, to which witness my hand and seal of office.


Notary Public, State of Texas

AFFIDAVIT OF SAJID ALI, M.D.





**Houston
Cardiology
Consultants**

To Whom It May Concern

Please excuse **Choudhri, Ali** from Work. He was seen in the office on June 7, 2024.

Remarks / Limitations:

Patient had a stroke with ongoing workup. Patient will need to be off work for a month. Patient shall not return to work until July 7, 2024. Patient shall not participate in any stressful interactions and not return to work until July 7, 2024.

If you have any questions or concerns please contact my office.

Sincerely,

Sajid Ali MD

Interventional Cardiology / Peripheral Vascular Disease

Houston Cardiology Consultants

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